

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

This policy is made pursuant to section 54.1 of the Modern Slavery Act 2015 for the year ending March 2021 and is made on behalf of all companies within IM Group. The statement covers IM Group including International Motors Ltd, IM Properties Ltd, Specialist Motor Finance, Spitfire, and Grace Foundation.

Organisation Structure and Supply Chain

IM Group is a family-owned business operating across the functions of automotive importation, property, and finance. Through all our operations we engage with a diverse and significant number of suppliers both UK based and international. Some of these suppliers due to their size will be required to comply with the Act by publishing their own Modern Slavery and Human Trafficking statements. For those outside of the requirements, we encourage them to comply with the intention of the Act.

Policies on Modern Slavery and Human Trafficking

IM Group is committed to opposing all forms of modern slavery, human rights violations, and child labour. We will treat all stakeholders, including our employees and supply chain, with fairness and respect and take steps to prevent unethical practices in our own business or in our supply chain. In addition, we will ensure effective processes and procedures are in place to ensure modern slavery and human trafficking is not taking place.

Managing Risk and Effectiveness

The IM Group Board monitor risks of modern slavery and human trafficking annually. Key controls put in place include:

- Assessment of risk for modern slavery and human trafficking undertaken before any new agreement with suppliers put in place
- Training and awareness amongst employees
- Requirements set out with Supply Chain.

After 4 years no issues of Modern Slavery and Human Trafficking have been identified within IM Group operations.

Procedures and Due Diligence

IM Group

Within IM Group we have controls in place to ensure compliance with all relevant employment legislation including but not limited to working hours, working conditions, minimum pay levels etc. Our HR processes validate all employees working for us are eligible to work within the UK.

All employees are encouraged to be vigilant to unethical practices and report concerns. Our Whistleblowing Policy provides further details on this. Training and awareness has been provided to employees on Modern Slavery and Human Trafficking detailing what it is, signs to look for and how to report concerns.

IM Group is an active member of the Slave Free Alliance.

Our Supply Chain

IM Group and its subsidiary businesses engage with a diverse and significant number of suppliers both UK based and international. These include but are not limited to manufacturers, distributors, material suppliers, main contractors, professional and specialist consultancies. The Group's standard terms of business includes provisions on modern slavery and human trafficking. Our suppliers must agree to our terms and conditions.

Monitoring and Reporting

The IM Group Board monitors the businesses modern slavery risks, controls and their effectiveness and any incidents of Modern Slavery or Human Trafficking identified.

The controls and training provision established and outlined in the above statement are considered effective mitigation of modern slavery and human trafficking risk within IM Group's operations and supply chain. IM Group will continue to keep the controls under review to ensure ongoing effectiveness and continuous improvement.

This policy is publicly available and supported by comprehensive guidance, training and awareness as required under the Modern Slavery Act.

Signed

A handwritten signature in black ink, appearing to read 'Gary Hutton'.

Gary Hutton

Executive Director

May 2021

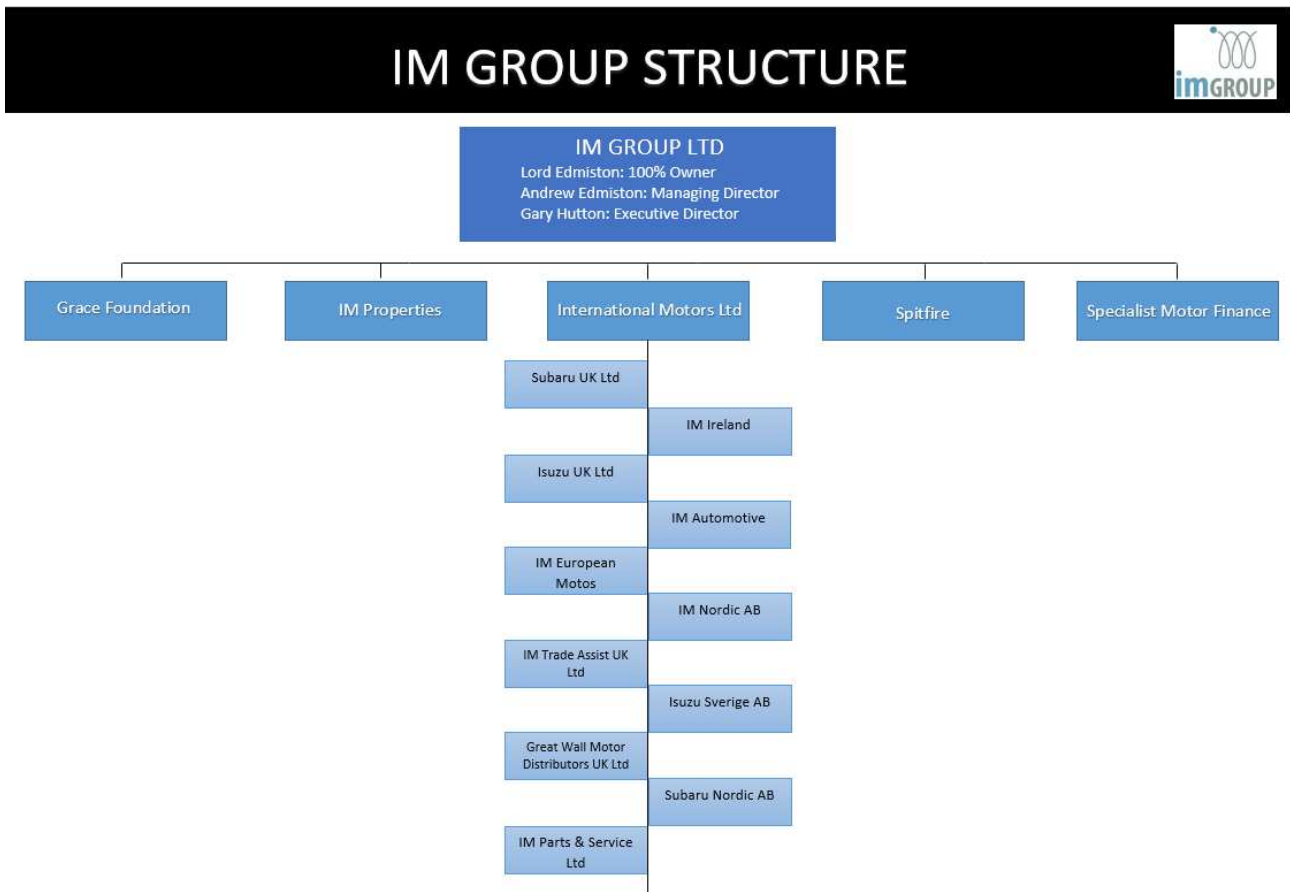
MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT FOR THE YEAR ENDING

MARCH 2021

1. This is IM Group’s fourth annual Modern Slavery and Human Trafficking Statement made pursuant to section 54.1 of the Modern Slavery Act 2015 for the year ending March 2021. It is made on behalf of all companies within IM Group. A list of the main companies within IM Group is set out in Appendix 1. This statement sets out the steps IM Group have taken and will take during this financial year to ensure that slavery and human trafficking is not taking place in any of our supply chains or in any part of our business and it also addresses those other matters set out in the Home Office statutory guidance.

IM Group is an active member of the Slave Free Alliance.

2. Structure and Supply Chains



IM Group, as the above diagram shows, embraces three core functions; property, automotive importation and finance. The activities undertaken by the relevant subsidiaries in these areas are complex and involve supply chains which in some instances stretch literally around the globe.

3. IM Group's policy in relation to modern slavery and human trafficking

IM Group is committed to opposing modern slavery in all its many forms and preventing it occurring either in our business or in our supply chains.

Our Chairman Lord Edmiston who supported the Modern Slavery Act from the government benches of the House of Lords has said this: "There are over 20 million people worldwide who are victims of involuntary servitude or compulsory labour. This is, therefore, not a problem which can be solved overnight but nor is it one which can be ignored. The Modern Slavery Act is an important step in the process and I have committed IM Group not just to be compliant with the Statute but to go beyond the minimum required and to try wherever we can assist in the elimination of these evil practices".

IM Group's policy in relation to modern slavery and human trafficking is accordingly one informed by its Chairman's deeply held beliefs and convictions: it is, therefore, to ensure that its business and suppliers do not directly or indirectly engage in practices which are prohibited by the Modern Slavery Act.

4. IM Group's due diligence procedures in relation to modern slavery and human trafficking in our business and supply chains

We have altered our standard terms of business so as to include provision to the following effect:

X agrees to use its best effort to ensure that neither it nor any of its subcontractors, vendors, agents or other associated third parties will utilize child, slave, prisoner or any other form of forced or involuntary labour, or engage in abusive employment or corrupt business practices or engage in any activity which constitutes an offence under any applicable laws in the countries in which it will manufacture the Goods/provide the Services which are the subject of this Agreement.

X agrees to use its best effort to comply with all applicable anti-corruption laws in the countries in which it will manufacture the Goods/provide the Services, and to ensure that neither it nor any of its subcontractors, vendors, agents or other associated third parties will engage in any form of commercial bribery, nor directly or indirectly provide or offer to provide, anything of value to or for the benefit of, any official or employee of a governmental authority or of any government-owned, government-controlled or government-affiliated entity to obtain or retain any contract, business opportunity or other business benefit, or to influence any act or decision of that person in his/her official capacity.

In case of non-compliance with the provisions of this Article by either party, the other party may terminate this Agreement in accordance with Article X under this Agreement.

5. Risk Assessment: The parts of our business and supply chains where there is a risk of modern and human trafficking taking place and the steps we have taken to assess and manage that risk

Before entering into any new agreement for the supply of any service or product we make an assessment – using a detailed schedule of criteria – as to whether the supplier is engaged in prohibited practices and we only enter into an agreement with that supplier if that assessment is positive.

6. Measuring Effectiveness: Our effectiveness in ensuring that modern slavery and human trafficking are not taking place in our business or in our supply chains

After 4 years of vigilance in this area we are confident that our business and supply chains are clear of any prohibited practices

7. Training for Staff: IM Group's staff training programme in relation to modern slavery and human trafficking

All senior staff have received a briefing with regard to the Modern Slavery Act as well as background material relating to the practices which are now prohibited by the Act. The staff will also receive during the course of this year in depth training with regard to:

- a) Identifying prohibited practices.
- b) What steps to take if any prohibited practices identified or suspected by them anywhere within our business or supply chain.

March 2021 – Approved by the IM Group Board of Directors



Gary Hutton

Executive Director

Annex 1 – The principal corporate entities operating within IM Group are set out below. Please note that this list is not all inclusive and this Statement relates to all companies which form part of IM Group whether or not they are currently trading and active and whether or not they are included in the list below.

Name of Entity	Country	Division
I.M. Group Limited	England	Parent
I.M. Facilities Limited	England	Automotive
International Motors Limited	England	Automotive
Subaru (UK) Limited	England	Automotive
Isuzu (UK) Limited	England	Automotive
I.M. Parts and Service Limited	England	Automotive
Daihatsu Vehicle Distributors Limited	England	Automotive
I.M. Trade Assist Limited	England	Automotive

Great Wall Motor Distributors (UK) Limited	England	Automotive
I.M. Insurance Limited	Guernsey	Insurance
International Motors Finance Limited (49%)	England	Automotive
I.M. Automotive Limited	Ireland	Automotive
I.M. European Motors Limited	Ireland	Automotive
I.M. Properties PLC	England	Property
I.M. Properties (Coleshill) Limited	England	Property
I.M. Properties Development Limited	England	Property
Spitfire Bespoke Homes Limited	England	Property
Specialist Motor Finance Limited	England	Finance
The Funding Corporation Limited	England	Finance
IMP Residential Capital Markets Limited	England	Property
IMP Investments HSBC Limited	England	Property
IM Properties Investments HSBC 2 Limited	England	Property
IMP Investments RBS Limited	England	Property
WATAD (UK) Properties Limited	England	Property
IMP Investments RBS 2 Limited	England	Property
IM Land 1 Limited	England	Property
IM Land 3 Limited	England	Property
IM Properties Strategic Land Group Limited	England	Property
IM Land 4 Limited	England	Property
IMP Hill Top Estates Limited	England	Property
IMP Investments LGB Limited	England	Property
IMP Investments SHB Limited	England	Property

IMP Investments Ltd	England	Property
Spitfire Properties (Newhall) Limited	England	Property
IM Properties (BVP 3) Limited	England	Property
IMP Development Management Limited	England	Property
IM. Land 2 Limited	England	Property
IMP Residential 2 Limited	England	Property
Specialist Motor Finance Services Limited	England	Financial
Specialist Motor Finance Group Limited	England	Financial
I.M. UK Trade Company Limited	England	Automotive
I.M. Properties (BVP 1) Limited	England	Property
International Motors Parts & Service Limited	England	Automotive
KVD Limited	England	Automotive
I.M. Holdings Limited	England	Property
I.M Financial Services Limited	England	Financial
I.M. Funding Limited	England	Financial
I.M. Finance Limited	England	Financial
Ensleigh Property Management Company Limited	England	Property
I.M. Group (Ensleigh) Limited	England	Property
I.M Properties Birmingham Development Limited	England	Property
I.M. Distribution Limited	England	Automotive
Mahindra Car Distributors (UK) Limited	England	Automotive
I.M. Equipment Limited	England	Automotive

I.M. Aviation Limited	England	Automotive
I.M. Properties (Croydon) Limited	England	Property
I.M. Properties (Milton Keynes) Limited	England	Property
Great Wall Motor Company Limited	England	Automotive
The Funding Corporation Group Limited	England	Financial
I.M. Properties (Dordon 2) Limited	England	Property
I.M. Properties (Logistics) Limited	England	Property
I.M. Properties Estates Limited	England	Property
I.M. Properties (Reading 2) Limited	England	Property
I.M. Property Trading Limited	England	Property
I M Properties (SHB) Limited	England	Property
I.M. Properties (Bristan) Limited	England	Property
I.M. Properties (Mell Square 1) Limited	England	Property
I.M Properties (BVP 2) Limited	England	Property
The Funding Corporation (1) Limited	England	Financial
The Funding Corporation (2) Limited	England	Financial
Cygnnet Financial Services Limited	England	Financial
ACF Car Finance Limited	England	Financial
I.M. Properties (WHB) Limited	England	Property
Yorkshire Property Holdings Limited	England	Property
I.M. Properties (Guildford 2) Limited	England	Property
IM Properties (Magna Park) Limited	England	Property
I.M. Properties (Maidenhead) Limited	England	Property
I.M Assured Growth and Exit Plc	England	Property

I.M. Property Holdings Limited	England	Property
First Residential Investment Limited	England	Property
I.M. Properties (Longton) Limited	England	Property
I.M. Properties Investment Limited	England	Property
I.M. Properties Finance Limited	England	Property
I.M Properties (Birmingham) Limited	England	Property
I.M. Properties (Abbey) Limited	England	Property
BVP Residential Management Company Limited	England	Property
Milcote Close (Welford) Management Company Limited	England	Property
Brampton Property Development Limited	England	Property
Greenings (Long Crendon) Management Company Limited	England	Property
Upper Acres (Ettington) Management Company Limited	England	Property
Hillcroft (Gretton) Management Company Limited	England	Property
Ashwood (Hockley Heath) Management Company Limited	England	Property
Haseley Manor Management Company Limited	England	Property
Highworth (Broadway) Management Company Limited	England	Property
Regents Green (Leamington Spa) Estate Management Company Limited	England	Property
Green Gates (Maidenhead) Management Company Limited	England	Property

Spitfire Homes Holdings Limited	England	Property
St Marks Gate Management Company Limited	England	Property